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The Honorable Mary Jo Heston
Chapter 13
Hearing Date: September 3, 2020
Hearing Time: 9:00 AM
Hearing Location: Telephonic
Response Due: August 27, 2020

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

IN RE:

SARAH HOOVER,

Debtor.

SARAH HOOVER,

Plaintiff,

v.

QUALITY LOAN SERVICE CORPORATION
OF WASHINGTON, PHH MORTGAGE
CORPORATION D/B/A PHH MORTGAGE
SERVICES, HSBC BANK USA, N.A, AS
TRUSTEE OF THE FIELDSTONE
MORTGAGE INVESTMENT TRUST,
SERIES 2006-2, NEW REZ, LLC, AND IH6
PROPERTY WASHINGTON, L.P. D/B/A
INVITATION HOMES,

Defendant.

BK Case No.: 19-42890-MJH

Adv No. 20-04002 – MJH

Chapter: 13

SUPPLEMENTAL DECLARATION OF
CHRISTINA L HENRY IN SUPPORT OF
PLAINTIFF'S COMBINED OPPOSITION
TO MOTIONS FOR SUMMARY
JUDGMENT BY DEFENDANTS' PHH
MORTGAGE CORPORATION, HSBC
BANK, AND NEWREZ, LLC, AND IH6
PROPERTY

I, Christina L Henry, hereby declare as follows:

1. I am a Plaintiff in the above-referenced adversary proceeding and I have personal
knowledge concerning all information in this declaration.

SUPPLEMENTAL DECLARATION OF CHRISTINA L HENRY IN
SUPPORT OF PLAINTIFF'S COMBINED OPPOSITION TO MOTIONS
FOR SUMMARY JUDGMENT BY DEFENDANTS' PHH MORTGAGE
CORPORATION, HSBC BANK, AND NEWREZ, LLC, AND IH6
PROPERTY - 1

HENRY & DEGRAAFF, P.S.
787 MAYNARD AVE S.
SEATTLE, WASHINGTON 98104
telephone (206) 330-0595
fax (206) 400-7609

2. Attached hereto as corrected Exhibit K filed as Dkt No. 73-20 which is a correct copy of the excerpts of the deposition of Michael Lappano, the Rule 30(b)(6) deponent for IH6 Property Washington (“IH6”) and taken on July 15, 2020 for this case.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE
OF WASHINGTON AND THE UNITED STATES THAT THE ABOVE IS TRUE
AND CORRECT.

Executed at Bothell, WA this January 7, 2021

/s/ *Christina L Henry*
Christina L Henry, WSBA# 31273